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FILED

AUG - 7 2012

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE NORTHERN DISTRICT OF CALIFORNIA
9 SAN JOSE DIVISION

| | | |
|------------------------------|---|---------------------------------|
| 10 UNITED STATES OF AMERICA, |) | No. CR-08-00866-02 EJD (PSG) |
| |) | |
| 11 Plaintiff, |) | STIPULATION TO PERMIT ROBERT |
| |) | TERRY BOHEN TO TRAVEL OUTSIDE |
| 12 vs. |) | THE NORTHERN DISTRICT AND |
| |) | CENTRAL DISTRICT OF CALIFORNIA |
| 13 STEPHEN JOSEPH HEUER and |) | ON AUGUST 23, 2012 RETURNING ON |
| 14 ROBERT TERRY BOHEN |) | OR BEFORE AUGUST 26, 2012, AND |
| |) | [PROPOSED] ORDER |
| 15 Defendants. |) | |
| |) | Honorable Howard R. Lloyd |

16
17 **STIPULATION**

18 Defendant and the government, through their respective counsel, hereby stipulate, subject
19 to the Court's approval, that the Order Setting the Conditions of Release issued by the Court on
20 March 5, 2009, be modified to permit Robert Terry Bohen, who lives in the Central District of
21 California, to travel by automobile on August 23, 2012, to Ensenada, Mexico for a vacation with
22 his wife and family, returning on August 26, 2012. Mr. Bohen will provide his itinerary to
23 Pretrial services 48 hours in advance of August 23, 2012, including his lodging and local
24 telephone numbers while in Ensenada, Mexico.

25 It is further stipulated that Pretrial Services shall release Mr. Bohen's passport forthwith
26 to Mr. Bohen or his attorney of record, the Office of the Federal Public Defender. Mr. Bohen

1 shall return and surrender his passport within 48 hours of August 26, 2012, to the Pretrial
2 Services office.

3 Counsel for the defense has provided a copy of this stipulation to Pretrial Services Officer
4 Jaime Carranza and he has expressed no objection to the stipulation and proposed order.

5 Dated: August 7, 2012

6 /s/
MANUEL U. ARAUJO
Assistant Federal Public Defender

7 Dated: August 7, 2012

8 /s/
JEFFREY NEDROW
Assistant United States Attorney

10 **ORDER**

11 GOOD CAUSE APPEARING, it is hereby ordered as follows:

12 The Order Setting the Conditions of Release issued by the Court on March 5, 2009, shall
13 be modified to permit Robert Terry Bohen who lives in the Central District of California to travel
14 on August 23, 2012, to Ensenada, Mexico, returning to the United States of America on or before
15 on August 26, 2012. It is further ordered that Mr. Bohen shall provide his itinerary to Pretrial
16 services FORTY-EIGHT hours in advance of August 23, 2012, including his lodging and local
17 telephone numbers while in the Mexico. IT IS ORDERED that Mr. Bohen report to Pretrial
18 Services any changes in his itinerary.

19 IT IS FURTHER ORDERED that Pretrial Services shall release Mr. Bohen's passport
20 forthwith to him or his attorney of record, the Office of the Federal Public Defender, and it is
21 further Ordered that Mr. Bohen return and surrender his passport within 48-hours of August 26,
22 2012, to the Pretrial Services office.

23 All other conditions of release ordered on March 5, 2009, remain in full force and
24 effect.

25 Dated: August 7, 2012

26 HOWARD R. LLOYD
United States Magistrate Judge